

**REMARKS**

In response to the Office Action dated January 22, 2007, Applicants respectfully request reconsideration and withdrawal of the rejections of the claims.

Claims 1-5 and 8-12 were rejected under 35 U.S.C. §102, on the basis of the Jeong et al patent (U.S. 5,990,692). Claim 6 was rejected under 35 U.S.C. §103, on the basis of the Jeong patent in view of the Boegh-Petersen patent (U.S. 4,833,402). Claims 7 and 13 were identified as containing allowable subject matter, which is noted with appreciation. In response thereto, claim 13 has been rewritten in independent form.

In Applicants' previous response, the rejection of the claims under 35 U.S.C. §102 was traversed, on the basis of two principle distinctions. First, Applicants pointed out that the Jeong patent does not disclose a leadframe support member formed with at least one groove for receiving semiconductor devices. Rather, it discloses a holding plate 20 having windows 22, i.e., holes. In responding to this argument, the most recent Office Action states that "groove" is a broad term, and therefore an aperture, such as the Jeong patent's window, qualifies as a "channel."

As set forth in M.P.E.P. §2111, claim terms must be given their broadest *reasonable* interpretation, consistent with the specification. The Office Action does not cite any support for the proposition that a person of ordinary skill in the art would consider it reasonable to interpret one of the Jeong patent's apertures, i.e. a hole through a substrate, to be a "channel" or a "groove." Webster's New Collegiate Dictionary defines a groove as "a long narrow channel or depression." This is precisely what is disclosed in the present application. See, for example, the grooves illustrated in Figures 2-4 and 16.

The Dictionary does not equate an aperture with these terms. It is respectfully submitted that the Office Action does not establish that the broadest *reasonable* interpretation of the term "groove" encompasses a through-hole in a substrate, as disclosed in the Jeong patent.

In any event, even if the Jeong patent's windows could be considered to be grooves, for the sake of argument, it is respectfully submitted that the Jeong patent does not disclose, nor otherwise suggest, the second distinction identified in Applicants' previous response, namely that the "leads extending from said [semiconductor] devices lie on a surface of said support member." It is noted that the most recent Office Action does not address this specific claim language. Rather, it states that the leads 12 of the semiconductor devices on the leadframe 10 "would be supported by" the leadframe support member 20. Whether or not the leads are supported by the leadframe support member is irrelevant. The claim recites that the leads "lie on" the surface of the support member. The Jeong patent explicitly teaches away from this claimed feature. Referring to Figure 4A, for example, it can be seen that the leads 12 of the semiconductor chip 1 are suspended over the window 22. The holding plate 20 does not come into contact with the leads 12. Consequently, these leads do not "lie on" a surface of the holding plate.

In discussing this claimed feature with the Examiner, he took the position that the leads 12 are on the same plane as the upper surface of the holding plate 20. Again, however, it is respectfully submitted that this fact is irrelevant. Claim 1 explicitly recites that the leads "lie on" the surface of the support member. It is respectfully submitted that a person of ordinary skill in the art would interpret this term to mean that the leads are in contact with the surface of the support member.

Since the Jeong patent explicitly discloses that the leads 12 are suspended over the window 22, these leads do not lie on any surface. Accordingly, the claim is not anticipated by the disclosure of the Jeong patent.

Nevertheless, to advance the application to issue, claim 1 now recites that the leads extending from the devices "rest upon" a surface of the support member. It is respectfully submitted that, even given its broadest reasonable interpretation, a person of ordinary skill in the art would not consider this term to encompass a situation such as that illustrated in the Jeong patent, where the leads are suspended over a window. These leads do not rest upon any structure, particularly the surface of the holding plate 20.

In addition to the foregoing distinctions, other differences are recited in the dependent claims. For example, claim 3 recites that the apparatus comprises means for releasably gripping a leadframe, so as to hold the leadframe in place. In connection with this claimed subject matter, the Office Action refers to elements 46 of the Jeong patent as gripping members. It is respectfully submitted, however, that these elements would not be construed to be *gripping* members. Rather, they are disclosed in the patent as guide pins, and are therefore more analogous to the locating pins recited in claim 9. There is no disclosure in the Jeong patent that these guide pins perform any type of "gripping" function, in a manner analogous to the gripping means 23 and gripping members 25 disclosed in the present application. Webster's New Collegiate Dictionary defines "grip" to mean "to seize or hold firmly." There is no suggestion in the Jeong patent that the guide pins 46 seize the leadframe, or firmly grasp it. Rather, they loosely contact the leadframe, to determine its location on the support plate.


Claim 5 recites means for moving the gripping members into and out of engagement with the leadframe. In rejecting this claim, the Office Action refers to elements 60, 62, 64 and 68 of the Jeong patent. Even if one interprets the guide pins 46 to be the gripping members, for the sake of argument, it is respectfully submitted that elements 60-68 do not function to move these guide pins into and out of engagement with the leadframe 10. Rather, the role of these elements is to drive the cover 50 of the testing apparatus. They do not play any role in moving the guide pins 46 and the leadframe 10 into and out of engagement with one another.

For at least the foregoing reasons, it is respectfully submitted that claims 1-5 and 8-12 are not anticipated by the disclosure of the Jeong patent. Furthermore, it is respectfully submitted that the Jeong patent does not suggest the subject matter of claim 6, even when considered in light of the Boegh-Petersen patent. Reconsideration and withdrawal of the rejections, and allowance of all pending claims is respectfully requested.

Respectfully submitted,

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